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| 1          | WRIGHT, FINLAY & ZAK, LLP   |  |  |  |  |
|------------|---|--|--|--|--|
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| 2          | Nevada Bar No. 8386<br>Lindsay D. Dragon, Esq.  |  |  |  |  |
| 3          | Nevada Bar No. 13474  |  |  |  |  |
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| 5          | (702) 475-7964; Fax: (702) 946-1345   |  |  |  |  |
| 6          | Idragon@wrightlegal.net   Attorneys for Plaintiff, HSBC Bank USA, National Association, as Trustee in Trust for the |  |  |  |  |
| 7          | Registered Holders of ACE Securities Corp. Home Equity Loan Trust, Series 2006-NC2, Asset                           |  |  |  |  |
|            | Backed Pass-Through Certificates  |  |  |  |  |
| 8          |   |  |  |  |  |
| 9          | UNITED STATES DISTRICT COURT DISTRICT OF NEVADA   |  |  |  |  |
| 10         |   |  |  |  |  |
|            | HSBC BANK USA, NATIONAL   | Case No.: 2:21-cv-01300-APG-NJK                  |  |  |  |
| 11         | ASSOCIATION, AS TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF   |  |  |  |  |
| 12         | ACE SECURITIES CORP. HOME EQUITY  | STIPULATION AND ORDER TO                         |  |  |  |
| 13         | LOAN TRUST, SERIES 2006-NC2, ASSET  | EXTEND TIME PERIOD TO                            |  |  |  |
|            | BACKED PASS-THROUGH   | RESPOND TO CHICAGO TITLE                         |  |  |  |
| 14         | CERTIFICATES,   | INSURANCE COMPANY'S OPPOSITION TO MOTION FOR     |  |  |  |
| 15         | Plaintiff,  | PARTIAL SUMMARY JUDGMENT                         |  |  |  |
| 16         | VS.   | [ECF No. 48]                                     |  |  |  |
| 17         | FIDELITY NATIONAL TITLE GROUP,  | [Einst Dagwest]                                  |  |  |  |
|            | INC.; CHICAGO TITLE INSURANCE   | [First Request]                                  |  |  |  |
| 18         | COMPANY; TICOR TITLE OF NEVADA,   |  |  |  |  |
| 19         | INC.; DOE INDIVIDUALS I through X; and ROE CORPORATIONS XI through XX,  |  |  |  |  |
| 20         | inclusive,  |  |  |  |  |
|            |   |  |  |  |  |
| 21         | Defendants.   |  |  |  |  |
| 22         | Plaintiff HSBC Bank USA National Ass  | sociation as Trustee in Trust for the Registered |  |  |  |
| 23         | Plaintiff, HSBC Bank USA, National Association, as Trustee in Trust for the Register                                |  |  |  |  |
| 24         | Holders of ACE Securities Corp. Home Equity Lo  | oan Trust, Series 2006-NC2, Asset Backed Pass-   |  |  |  |
|            | Through Certificates ("HSBC Bank") and D  | efendant Chicago Title Insurance Company         |  |  |  |
| 25         | ("Chicago Title"), by and through their counsel of record, hereby stipulate and agree as follows:                   |  |  |  |  |
| 26         | 1. On July 8, 2021, HSBC Bank filed its Complaint in Eighth Judicial District Court,                                |  |  |  |  |
| 27         |   |  |  |  |  |
| 28         | Case No. A-21-837574 -C [ECF No.  | 1-1];  |  |  |  |
| <b>-</b> 1 |   |  |  |  |  |

| 1                               |     | 2. | On July 8, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1]; |
|---------------------------------|-----|----|--|
| 2                               |     | 3. | On September 10, 2021, Chicago Title filed a Motion to Dismiss [ECF No. 19];           |
| 3                               |     | 4. | On November 19, 2021, HSBC Bank filed an Opposition to Chicago Title's Motion          |
| 4                               |     |    | to Dismiss [ECF No. 39] and a Countermotion for Partial Summary Judgment [ECF          |
| 5                               |     |    | No. 40];   |
| 6                               |     | 5. | On January 10, 2022, Chicago Title filed its Reply in Support of its Motion to Dismiss |
| 7                               |     |    | and an Opposition to HSBC Bank's Countermotion for Partial Summary Judgment            |
| 8                               |     |    | [ECF No. 48] ("Opposition").   |
| 9                               |     | 6. | HSBC Bank's deadline to respond to Chicago Title's Opposition is January 24, 2022.     |
| 10                              |     | 7. | HSBC Bank's counsel is requesting a brief two-week extension until February 7,         |
| 11                              |     |    | 2022, to file its response to the pending Opposition;                                  |
| 12                              |     | 8. | This extension is requested to allow counsel for HSBC Bank additional time to review   |
| 13                              |     |    | and respond to the points and authorities cited to in the pending Opposition;          |
| 14                              |     | 9. | Counsel for Chicago Title does not oppose the requested extension;                     |
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| 1  | 10. This is the first request for an extension which is made in good faith and not for |  |  |  |
|----|--|--|--|--|
| 2  | purposes of delay.   |  |  |  |
| 3  | IT IS SO STIPULATED.   |  |  |  |
| 4  | DATED this 24 <sup>th</sup> day of January, 2022.                                      | DATED this 24th day of January, 2022.  |  |  |
| 5  | WRIGHT, FINLAY & ZAK, LLP  | SINCLAIR BRAUN LLP   |  |  |
| 6  | /s/ Lindsay D. Dragon  | /s/ Kevin S. Sinclair  |  |  |
| 7  | Lindsay D. Dragon, Esq. Nevada Bar No. 13474   | Kevin S. Sinclair, Esq.,<br>Nevada Bar No. 12277                                       |  |  |
| 8  | 7785 W. Sahara Ave., Suite 200   | 16501 Ventura Boulevard, Suite 400   |  |  |
| 9  | Las Vegas, NV 89117 Attorneys for Plaintiff, HSBC Bank USA,                            | Encino, California 91436 Attorneys for Defendants Fidelity National                    |  |  |
| 10 | National Association, as Trustee in Trust for the Registered Holders of ACE Securities | Title Group, Inc.; Chicago Title Insurance<br>Company; and Ticor Title of Nevada, Inc. |  |  |
| 11 | Corp. Home Equity Loan Trust, Series 2006  | 1 1  |  |  |
| 12 | NC2, Asset Backed Pass-Through Certificates  |  |  |  |
| 13 |  |  |  |  |
| 14 | IT IS SO ORDERED.  |  |  |  |
| 15 | Dated this 25th day of January   | , 2022.  |  |  |
| 16 | ·  | 0  |  |  |
| 17 | $\overline{\mathbf{U}}$  | NITED STATES DISTRICT COURT JUDGE  |  |  |
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